

UNITED STATES DISTRICT COURT

for the
Central District of California

In the Matter of the Search of:)
United States Postal Service parcels 9505)
5145 0164 4040 8576 76 ("SUBJECT)
PARCEL 1"); 9505 5145 0163 4040 5607)
51("SUBJECT PARCEL 2"); 9505 5145 5758)
4040 9426 15 ("SUBJECT PARCEL 3");)
9505 5156 2931 4040 6515 13 ("SUBJECT)
PARCEL 4"); and 9505 5152 6656 4040 8754)
18 ("SUBJECT PARCEL 5").

Case No. 2:24-MJ-00827

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A

located in the Central District of California, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is:

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;

The search is related to a violation of:

Code Section

21 U.S.C. § 841(a)(1)
21 U.S.C. § 846
21 U.S.C. § 843(b)

Offense Description

Distribution of a controlled substance
Conspiracy to distribute a controlled substance
Use of a communication facility to facilitate the distribution of a controlled substance

The application is based on these facts:

See attached Affidavit, which is incorporated herein by reference.

Applicant's signature

USPIS Investigator Troy Maki

Printed name and title

Attested to by the applicant by telephone.

Date: _____

Judge's signature

City and state: Los Angeles, CA

Hon. Michael Wilner, Magistrate Judge

Printed name and title

AUSA: Sarah E. Spielberger (x3358)

ATTACHMENT A

PARCELS TO BE SEARCHED

The following five United States Postal Service ("USPS") parcels, (collectively, the "SUBJECT PARCELS"), seized on February 9, 2024, from Los Angeles, California, and currently in the custody of the United States Postal Inspection Service ("USPIS") in Los Angeles, California:

a. SUBJECT PARCEL 1 is a USPS Priority Mail parcel with tracking label number 9505 5145 0164 4040 8576 76, weighing approximately four pounds 2.2 ounces, with a listed return address of "Estefani Arteaga, 6576 Scout Ave. Bell Gardens, CA 90201."

b. SUBJECT PARCEL 2 a USPS Priority Mail parcel with tracking label number 9505 5145 0163 4040 5607 51, weighing approximately six pounds 14.8 ounces, with a listed return address of "Tuelisse Santiago, 5881 Fostoria St. Bell Gardens, CA 90201," and a recipient address of "Alonda N. Rodriguez. Urb Villa Del Carmen. Calle 3 E9, Cidra, P.R. 00739."

c. SUBJECT PARCEL 3 is a USPS Priority Mail parcel with tracking label number 9505 5145 5758 4040 9426 15, weighing approximately four pounds 8.8 ounces, with a listed return address of "Romein Duffy, 2532 Daly St. Los Angeles, CA 90031," and a recipient address of "Kai DeVan, 2113 Green St. Harrisburg, PA 17110."

d. SUBJECT PARCEL 4 is a USPS Priority Mail parcel with tracking label number 9505 5156 2931 4040 6515 13, weighing approximately two pounds six ounces, with a listed return

address of "Maria Almazan, 4516 W 160th St. Lawndale, CA 90260," and a recipient address of "Miguel Almazan, 909 Sunrise Dr. Marshall, MO 65340."

e. SUBJECT PARCEL 5 is a USPS Priority Mail parcel with tracking label number 9505 5152 6656 4040 8754 18, weighing approximately seven pounds fourteen ounces, with a listed return address of "2108 Monterey Blvd. Hermosa Beach, CA 90254," and a recipient address of "Brooke Erickson CMU. 1620 Maverick Way B102. Grand Junction, CO 81501."

ATTACHMENT B

ITEMS TO BE SEIZED

The following items are to be seized from the SUBJECT PARCELS described in Attachment A, which constitute evidence, fruits, and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance):

- a. Any controlled substances;
- b. Currency, money orders, bank checks, or similar monetary instruments in quantities over \$1,000; and
- c. Any associated packaging materials.

AFFIDAVIT

I, Troy Maki, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS") assigned to the Indianapolis Domicile of the Detroit Division. I am assigned to investigate the unlawful transportation of contraband, including Title 21 controlled substances, through the U.S. Mail.

2. I have been a Postal Inspector since April 2022. I attended and graduated the USPIS Basic Inspector Training course in Potomac, Maryland, where I was trained in investigative techniques that Federal Law Enforcement Officers use to establish probable cause that a crime has been committed. Prior to becoming a Postal Inspector, I was a Sheriff's Deputy in Utah for two years.

3. As part of my duties, I investigate incidents wherein the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances such as marijuana, cocaine, methamphetamine and heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716. I have conducted numerous parcel investigations that have resulted in the arrest of individuals who have received and distributed controlled substances, as well as the seizure of illegal drugs and proceeds from the sale of illegal drugs.

4. I have completed thousands of hours of criminal investigations, including compiling information; interviewing victims, witnesses, and suspects; and collecting evidence to support criminal charges. I have worked with other experienced state and federal law enforcement officers and supervisors and have gained knowledge and experience from them. My work has involved preparing and assisting in the drafting and service of numerous search warrants.

II. PURPOSE OF AFFIDAVIT

5. This affidavit is made in support of an application for a warrant to search the following parcels (collectively, the "SUBJECT PARCELS"), as described more fully in Attachment A, which were shipped through the United States Postal Service ("USPS") and are currently in the custody of USPIS in Los Angeles, California:

- a. A USPS parcel with tracking number 9505 5145 0164 4040 8576 76 ("SUBJECT PARCEL 1");
- b. A USPS parcel with tracking number 9505 5145 0163 4040 5607 51 ("SUBJECT PARCEL 2");
- c. A USPS parcel with tracking number 9505 5145 5758 4040 9426 15 ("SUBJECT PARCEL 3");
- d. A USPS parcel with tracking number 9505 5156 2931 4040 6515 13 ("SUBJECT PARCEL 4"); and
- e. A USPS parcel with tracking number 9505 5152 6656 4040 8754 18 ("SUBJECT PARCEL 5").

6. The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of

21 U.S.C. §§ 841(a)(1) (distribution and possession with intent to distribute a controlled substance), 846 (conspiracy to distribute or possess with intent to distribute a controlled substance), and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "SUBJECT OFFENSES"), as described more fully in Attachment B.

7. Attachments A and B are incorporated by reference.

8. The facts set forth in this affidavit are based on my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically noted otherwise, all conversations and statements described in this affidavit are provided in substance and in part only.

III. SUMMARY OF PROBABLE CAUSE

9. Each SUBJECT PARCEL meets certain criteria common to packages containing contraband. For instance, the SUBJECT PARCELS have handwritten labels and the names of senders and/or recipients did not appear in law enforcement databases as associated with some of the listed addresses. Furthermore, a drug-detection dog alerted to each SUBJECT PARCEL. The SUBJECT PARCELS are therefore believed to contain controlled substances or the proceeds from the trafficking of controlled substances.

IV. STATEMENT OF PROBABLE CAUSE

10. Based on my training and experience, my conversations with other Postal Inspectors who specialize in drug investigations, my review of law enforcement reports, and my own participation in this investigation, I know the following:

A. Background on Use of Mail for Drug Trafficking

11. Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In the early 1990s, Postal Inspectors in Los Angeles, California, began conducting organized interdictions of Priority Mail Express and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances. Postal Inspectors also regularly examined and investigated Priority Mail Express and Priority Mail parcels. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances, in the form of cash, using boxes.

12. Although Postal Inspectors still see boxes used to send for controlled substances and cash, there has been a gradual change over the years toward the current trend of using smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances, which lend a sense of legitimacy to the parcel's appearance.

13. Los Angeles is a significant source area for controlled substances. Controlled substances are frequently transported from the Los Angeles area via the United States Mail, and the proceeds from the sale of controlled substances are frequently returned to Los Angeles area via the United States Mail. These proceeds are generally in the form of money orders, bank checks, or similar monetary instruments in amounts over \$1,000. Based on my training and experience, I know that proceeds from the sale of controlled substances often contain the odor of controlled substances because they have been contaminated with or associated with the odor of one or more controlled substances.

14. Drug traffickers often use one of two USPS services: Priority Mail Express, which is the USPS overnight/next day delivery mail product, or Priority Mail Service, which is the USPS two-to-three-day delivery mail product. Drug traffickers use the Priority Mail Express delivery service because of its speed, reliability, and the ability to track the parcel's progress to the intended delivery point. Drug traffickers use the Priority Mail delivery service because it allows drug traffickers more time for travel between states if they decide to follow a shipment to its destination for distribution. Also, by adding delivery confirmation to a Priority Mail parcel, drug traffickers have the ability to track the parcel's progress to the intended delivery point, as if the parcel had been mailed using the Priority Mail Express Service.

15. Based on my training and experience, and the collective experiences that my fellow Postal Inspectors who specialize in drug investigations have related to me, I know that the following indicia suggest that a parcel may contain drugs or drug trafficking proceeds:

a. The parcel is contained in a box, flat cardboard mailer, or Tyvek envelope;

b. The parcel bears a handwritten label, whether USPS Express Mail or Priority Mail;

c. The handwritten label on the parcel does not contain a business account number;

d. All the seams of the parcel are taped or glued shut;

e. The parcel emits a particular odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and

f. Multiple parcels are mailed by the same individual, on the same day, from different locations.

16. Parcels exhibiting some of these characteristics are the subject of further investigation, which may include verification of the addressee and return addresses, and examination by a trained drug detection dog.

17. I know from my experience and training that drug traffickers often use fictitious or incomplete names and/or addresses in an effort to conceal their identities from law enforcement officers investigating these types of cases.

Indeed, it is my experience that to the extent real addresses

are ever used, it is only to lend an appearance of legitimacy to the parcel, and is almost always paired with a false name.

B. Initial Investigation of the SUBJECT PARCELS

18. On or about February 9, 2024, I identified the SUBJECT PARCELS in the mail stream at a United States Post Office in Los Angeles.

19. I saw that the SUBJECT PARCELS met some of the above-mentioned indicia for the identification of parcels containing controlled substances or controlled substances proceeds. Specifically, the SUBJECT PARCELS had handwritten labels and the names of senders and/or recipients did not appear in law enforcement databases as associated with some of the listed addresses.

20. On or about February 12, 2024, I reviewed reports generated from law enforcement databases to check the sender information listed on the SUBJECT PARCELS and determined the following:

a. SUBJECT PARCEL 1 is a USPS Priority Mail parcel with tracking label number 9505 5145 0164 4040 8576 76, weighing approximately four pounds 2.2 ounces, with a listed return address of "Estefani Arteaga, 6576 Scout Ave. Bell Gardens, CA 90201" and a recipient address of "Avinalexis Arteaga, 1432 Glacier Ave. Unit A. JBER, AK 99505." According to law enforcement database records, the address is valid but was not associated with the name "Estefani Arteaga," and the recipient address of is valid but is not associated with the name "Avinalexis Arteaga."

b. SUBJECT PARCEL 2 is a USPS Priority Mail parcel with tracking label number 9505 5145 0163 4040 5607 51, weighing approximately six pounds 14.8 ounces, with a return address of "Tuelisse Santiago, 5881 Fostoria St. Bell Gardens, CA 90201," and a recipient address of "Alonda N. Rodriguez. Urb Villa Del Carmen. Calle 3 E9, Cidra, P.R. 00739." According to law enforcement database records, the return address is a valid but was not associated with the name "Tuelisse Santiago," and the recipient address is valid but is not associated with the name "Alondra N. Rodriguez."

c. SUBJECT PARCEL 3 is a USPS Priority Mail parcel with tracking label number 9505 5145 5758 4040 9426 15, weighing approximately four pounds 8.8 ounces, with a return address of "Romein Duffy, 2532 Daly St. Los Angeles, CA 90031," and a recipient address of "Kai DeVan, 2113 Green St. Harrisburg, PA 17110." According to law enforcement database records, the return address is valid but is not associated with the name "Romein Duffy," and the recipient address is valid but is not associated with the name "Kai DeVan."

d. SUBJECT PARCEL 4 is a USPS Priority Mail parcel with tracking label number 9505 5156 2931 4040 6515 13, weighing approximately two pounds six ounces, with a return address of "Maria Almazan, 4516 W 160th St. Lawndale, CA 90260," and a recipient address of "Miguel Almazan, 909 Sunrise Dr. Marshall, MO 65340." According to law enforcement database records, the return address is valid but was not associated with the name

"Maria Almazan," and the recipient address is valid but was not associated with the name "Miguel Almazan."

e. SUBJECT PARCEL 5 is a USPS Priority Mail parcel with tracking label number 9505 5152 6656 4040 8754 18, weighing approximately seven pounds fourteen ounces, with a return address of "2108 Monterey Blvd. Hermosa Beach, CA 90254," and a recipient address of "Brooke Erickson CMU. 1620 Maverick Way B102. Grand Junction, CO 81501." According to law enforcement database records, the return address is valid, and the recipient address is valid but was not associated with the name "Brooke Erickson CMU."

C. Drug-Detection Dog Alerts to the SUBJECT PARCELS

21. On February 12, 2024, based on the suspicious characteristics of the SUBJECT PARCELS, South Gate Police Department Detective Antonio Mendez had his trained narcotics detection dog, "Otis," examine the exterior of the SUBJECT PARCELS. These exterior examinations were completed individually. I learned from Detective Mendez that Otis gave a positive alert to each of the SUBJECT PARCELS separately, indicating the presence of controlled substances or other items, such as the proceeds of controlled substances, which emitted the odor of controlled substances.

22. Attached hereto as Exhibit 1, and incorporated herein by reference, is a true and correct copy of information provided to me by Detective Mendez regarding Otis's training and history in detecting controlled substances.

V. CONCLUSION

23. For the reasons set forth above, there is probable cause to believe that the items listed in Attachment B, which constitute the evidence, fruits, and instrumentalities of the SUBJECT OFFENSES, will be found in the SUBJECT PARCELS, as described in Attachment A.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this _____ day of February, 2024.

HONORABLE MICHAEL WILNER
UNITED STATES MAGISTRATE JUDGE

AFFIDAVIT

I, Antonio Mendez, being duly sworn, declare and state as follows:

I have been a Police Officer with the City of South Gate Police Department since May of 1997. I am currently assigned as a detective to the Narcotic and Special Problems Unit with my K-9 partner Otis. I have handled and/or assisted federal and state narcotics task forces with hundreds of controlled substance investigations. I have attended approximately 200+ hours of narcotic and investigative related classes; in addition to being a member in good standing with the California's Narcotic Officers Association.

In September 2020, Otis and I successfully completed an 80-hour formal training course conducted under the direction of Rodney Spicer of Gold Coast K9. Mr. Spicer has over 30 years of experience in handling and training narcotics detection canines and is a certified K9 evaluator under POST (Commission on Peace Officers Standards and Training). Otis' training certified him to alert to the presence of cocaine, methamphetamine, Fentanyl and heroin. I also conduct ongoing training on a monthly basis in various locations of interdiction, such as vehicles, truck tractor and trailers, schools, parcels, airports, storage units, residences, jails, motels, and apartments, as well as in various quantities of drugs. This training also includes controlled negative (blank) testing, in which all objects or locations have no contraband present and training with neutralizing odors which are common items associated with controlled substances, such as plastic bags, plastic gloves, and food. Otis was last certified on December 14, 2023.

As of January 2024, Otis and I have completed over 400 hours of training. I am familiar and knowledgeable about the

changes in Otis's behaviors when he detects the presence of the odor of illegal controlled substances.

On Monday February 12, 2024 at approximately 12:15 PM, Otis and

I responded to a request for narcotic detection K-9 at 1055 N. Vignes Street, Los Angeles, CA 90012. Otis alerted to the presence of scent of narcotics on or in the following inbound Parcels

1. 9505 5145 0164 4040 8576 76
2. 9505 5145 0163 4040 5607 51
3. 9505 5145 5758 4040 9426 15
4. 9505 5156 2931 4040 6515 13
5. 9505 5152 6656 4040 8754 18

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at 12:15 PM on the 12th day of February 2024 in Los Angeles County.



Antonio Mendez, Detective